

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

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IN RE: NEW ENGLAND COMPOUNDING )  
PHARMACY, INC. PRODUCTS LIABILITY )  
LITIGATION ) MDL No.: 1:13-md-2419-FDS  
)  
This Document Relates to: )  
All Cases )  
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)  
IN RE: NEW ENGLAND COMPOUNDING )  
PHARMACY CASES ) Master Docket No. 12-12052 - FDS  
)  
This Document Relates to: )  
All Cases )

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**NOTICE OF CHAPTER 11 TRUSTEE'S MOTION TO TRANSFER  
PERSONAL INJURY TORT AND WRONGFUL DEATH CASES  
TO THIS COURT PURSUANT TO 11 U.S.C. §§ 157(b)(5) AND 1334**

**PLEASE TAKE NOTICE** that on March 10, 2013, Paul D. Moore, the Chapter 11 Trustee (the "Trustee") for the Estate of New England Compounding Pharmacy, Inc. ("NECC" or the "Debtor") filed a motion [Case No. 13-2419, Doc. No. 37] (the "Motion") in the multidistrict litigation involving NECC pending in the United States District Court for the District of Massachusetts (the "Court") for entry of an order transferring to the Court the personal injury and wrongful death cases identified on Exhibit A to the memorandum [Case No. 13-2419, Doc. No. 38] (the "Memorandum") in support of the Motion (as amended, the "Schedule of Pending Actions");

**PLEASE TAKE FURTHER NOTICE** that on March 15, 2013, the Trustee filed an Amended Schedule of Pending Actions to include additional actions [Doc. No. 57];

**PLEASE TAKE FURTHER NOTICE** that on April 16, 2013, the Trustee filed the Second Amended Schedule of Pending Actions;

**PLEASE TAKE FURTHER NOTICE** that on April 11, 2013, the Court entered an order establishing and approving certain procedures for the Motion as it relates to the Schedule of Pending Actions (the “Procedures Order”);

**PLEASE TAKE FURTHER NOTICE** that any oppositions must be filed by **May 2, 2013**, and must be in writing, conform to the local rules of the Court, and be filed through the CM/ECF system;

**PLEASE TAKE FURTHER NOTICE** that the Motion, Memorandum, exhibits to the Memorandum, the proposed order relating to the Motion, the Schedule of Pending Actions and the Procedures Order are available on the website maintained by the claims agent retained in the Debtor’s bankruptcy case at <http://www.donlinrecano.com/cases/caseinfo/necp> and/or by requesting copies of same from the undersigned counsel; and

**PLEASE TAKE FURTHER NOTICE** that, unless written objections to the Motion are filed with the Court by May 2, 2013, there may not be a hearing and the Motion may be approved.

Dated: April 16, 2013

DUANE MORRIS LLP

/s/ Michael R. Gottfried

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Counsel for Paul D. Moore, in his capacity as Chapter 11 Trustee of the Defendant New England Compounding Pharmacy, Inc., d/b/a New England Compounding Center